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ATTORNEYS FOR PLAINTIFFS

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

CHINA CENTRAL TELEVISION, a China
company; CHINA INTERNATIONAL
COMMUNICATIONS CO., LTD., a China
company; TVB HOLDINGS (USA), INC., a
California corporation; and DISH
NETWORK L.L.C., a Colorado corporation,
Plaintiffs,

vs.

CREATE NEW TECHNOLOGY (HK)
LIMITED, a Hong Kong company; HUA
YANG INTERNATIONAL TECHNOLOGY
LIMITED, a Hong Kong company;
SHENZHEN GREATVISION NETWORK
TECHNOLOGY CO. LTD., a China
company; CLUB TVPAD, INC., a California
corporation; BENNETT WONG, an
individual, ASHA MEDIA GROUP INC.
d/b/a TVPAD.COM, a Florida corporation;
AMIT BHALLA, an individual;
NEWTVPAD LTD. COMPANY d/b/a
NEWTVPAD.COM a/k/a TVPAD USA, a
Texas corporation; LIANGZHONG ZHOU,
an individual; HONGHUI CHEN d/b/a E-
DIGITAL, an individual; JOHN DOE 1 d/b/a
BETV; JOHN DOE 2 d/b/a YUE HAI; JOHN
DOE 3 d/b/a 516; JOHN DOE 4 d/b/a HITV;
JOHN DOE 5 d/b/a GANG YUE; JOHN
DOE 6 d/b/a SPORT ONLINE; JOHN DOE 7
d/b/a GANG TAI WU XIA; and JOHN DOES
8-10,

Defendants.

Case No.
CV 15-1869 SVW (AJWx)

**COMPENDIUM OF
EVIDENCE
IN SUPPORT OF
PLAINTIFFS' MOTION FOR
DEFAULT JUDGMENT
AGAINST ASHA MEDIA
GROUP INC. VOL. 4 OF 4**

[[Proposed] Order; Motion For
Default Judgment concurrently
submitted]

Date: November 7, 2016

Time: 1:30 p.m.

Courtroom: 6

Judge: Hon. Stephen V.
Wilson

Complaint Filed: March 13, 2015

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EXHIBIT 95



DISH Network L.L.C.
P.O. Box 6663, Englewood, CO 80155-6663
303.723-1000

November 20, 2014

Via Federal Express and Email

Create New Technology (HK) Limited
Room D, 10/F
Tower A, Billion Centre
1 Wang Kwong Road
Kowloon Bay, Kowloon
HONG KONG

Email: sales@creatent.net; help@itvpad.com

Re: Infringement of Programming

To Whom It May Concern:

I am the Senior Vice President, International & Legal Affairs for DISH Network L.L.C. ("DISH"), which is the exclusive satellite provider in the United States of certain copyrighted television programming owned and distributed by China Central Television and its affiliated companies ("CCTV"), and the exclusive satellite and "over the top" provider in the United States of certain copyrighted television programming owned and distributed by Television Broadcasts Limited and its affiliated companies ("TVB"). On behalf of DISH, CCTV and TVB, I am writing to demand that you immediately cease and desist from infringing and/or contributing to the infringement of CCTV and TVB programs.

As you may know, DISH is a leading provider of satellite television programming in the United States, with over 14 million commercial and residential subscribers. In addition to providing programming that originates in the United States, DISH is also proud to provide its U.S. customers with programming that is produced in other countries. This includes television content from CCTV and TVB.

It has come to our attention that CNT manufactures a set-top device known as the "TVpad" and sells the device through a global network of distributors, including distributors in the United States. As you are aware, the TVpad device enables customers to view pirated television programming (played live, time-delayed, and on-demand) from overseas, including pirated television programming from Hong Kong and mainland China. It is our understanding

that CNT makes no payment to DISH, CCTV, TVB or other broadcasters for the use of this content, and neither DISH, CCTV nor TVB has authorized CNT or any other party to make CCTV or TVB content available through the TVpad. The unauthorized reproduction, public performance, display, and distribution of CCTV and TVB content in the United States constitutes copyright infringement under U.S. law.

It is our understanding that CNT is responsible not only for manufacture and sale of the TVpad device, but also for acquiring, reproducing and making available the unauthorized content on the device through an “app store,” by means of applications available through that store, some or all of which may operate on a peer-to-peer basis. In light of the foregoing, we have cause to believe that CNT and/or persons acting in concert with CNT are directly infringing the copyrights in television programming for which DISH, CCTV and/or TVB own exclusive rights, as well as inducing, materially contributing to, and failing to control the blatant infringing activities of others through the TVpad device.

Attached hereto as Exhibit A is a list of applications available on the TVpad app store that provide infringing content and a list of the CCTV and TVB channels transmitted through those applications. Attached hereto as Exhibit B is a representative list of some of the CCTV and TVB programs that are illegally provided by CNT and/or persons acting in concert with CNT. Please be aware, however, that all of the CCTV and TVB television programming accessible through the TVpad by whatever means—whether live, time-delayed, or on-demand—is infringing.

We demand that CNT and any parties acting in concert with CNT, or pursuant to CNT’s direction or control, immediately: **(a) cease and desist providing CCTV and TVB content through the TVpad and its affiliated network; and (b) cease and desist providing the applications listed in Exhibit A, and any similar infringing applications, through the TVpad app store or otherwise.** The continued reproduction, performance, display, and distribution of CCTV and TVB content following receipt of this letter may constitute willful infringement.

We note that CNT has not designated an agent under the Digital Millennium Copyright Act (“DMCA”) for notification of claims of infringement pursuant to Section 512(c) of the DMCA. However, for the avoidance of doubt, in the unlikely event that any of the infringing content delivered through the TVpad app store and the applications available therein is provided by third parties, this letter constitutes notice on behalf of DISH, CCTV and TVB, under 17 U.S.C. § 512(c)(3)(A), that DISH, CCTV and TVB have a good faith belief that the reproduction, performance, display, and distribution of these applications, and the content provided through these applications including the representative programming listed on Exhibit B, is not authorized and infringes the respective rights of DISH, CCTV and TVB in their copyrighted works. We accordingly demand that you remove or disable access to the infringing material. If you fail to do so, you may be liable for damages and injunctive relief. I certify that the information we have provided is accurate and that, under penalty of perjury, I am authorized to act on behalf of DISH, CCTV and TVB, owners of the rights infringed by the above-referenced content.

This letter is without prejudice to any of DISH's, CCTV's or TVB's rights or remedies at law or in equity, all of which are specifically reserved.

Sincerely,

A handwritten signature in black ink, appearing to read "CK", is written over the word "Sincerely,".

Chris Kuelling
Senior Vice President, International Business & Legal Affairs
DISH Network L.L.C.



DISH Network L.L.C.
P.O. Box 6663, Englewood, CO 80155-6663
303.723-1000

November 20, 2014

Via Federal Express and Email

Asha Media/TVpad.com
PO Box 6282
Brandon, Florida 33511

411 Walnut Street
Suite #5900
Green Cove Springs, FL, 32043

Email: sales@tvpad.com

Re: Infringement of Programming

To Whom It May Concern:

I am the Senior Vice President, International & Legal Affairs for DISH Network L.L.C. ("DISH"), which is the exclusive satellite provider in the United States of certain copyrighted television programming owned and distributed by China Central Television and its affiliated companies ("CCTV"), and the exclusive satellite and "over the top" provider in the United States of certain copyrighted television programming owned and distributed by Television Broadcasts Limited and its affiliated companies ("TVB"). On behalf of DISH, CCTV and TVB, I am writing to demand that you immediately cease and desist from infringing and/or contributing to the infringement of CCTV and TVB programs.

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It has come to our attention that Asha Media is currently selling a set-top device known as the "TVpad" that enables customers to view pirated television broadcasts (played live, time-delayed, and on-demand) from overseas, including pirated television programming from Hong Kong and mainland China. We also understand that Asha Media promotes the availability of

TVB and CCTV programming through the TVpad device. It is our further understanding that neither Asha Media nor any other party makes any payment to DISH, CCTV, TVB or other broadcasters for the use of this content, and neither DISH, CCTV nor TVB has authorized Asha Media or any other party to make content available through the TVpad. The unauthorized reproduction, public performance, display, and distribution of CCTV and TVB content in the United States constitutes copyright infringement under U.S. law, as does the advertising and promotion of the availability of—and the encouragement of consumers to access—such infringing content.

It is our understanding that pirated CCTV and TVB content on the TVpad device is made available to your customers without authorization through an “app store,” by means of applications available through that store, some or all of which may operate on a peer-to-peer basis. In light of the foregoing, we have cause to believe that the parties responsible for acquiring, reproducing, and transmitting pirated CCTV and TVB content on the device, as well as customers who purchase and use the TVpad device, may directly infringe the copyrights in television programming for which DISH, CCTV and/or TVB owns exclusive rights. Asha Media is therefore liable for secondary copyright infringement because of its involvement in the sale and distribution of TVpad devices, its inducement of customers to infringe CCTV and TVB programming, and its material contribution to the infringing activities of others. Attached hereto as Exhibit A is a list of applications available on the TVpad app store that provide infringing content and a list of the CCTV and TVB channels transmitted through those applications. Attached hereto as Exhibit B is a representative list of some of the CCTV and TVB programs that are illegally provided through those applications. Please be aware, however, that all of the CCTV and TVB television programming accessible through the TVpad by whatever means—whether live, time-delayed, or on-demand—is infringing.

We demand that Asha Media immediately: **(a) cease and desist selling TVpad devices that offer the applications listed in Exhibit A, or any similar infringing applications, through the TVpad app store; (b) cease and desist providing the applications listed in Exhibit A, and any similar applications; and (c) cease and desist marketing and promoting the availability of CCTV and TVB content on the TVpad, and encouraging consumers to access such content through the TVpad.** Your continued infringing activity following receipt of this letter may constitute willful infringement.

This letter is without prejudice to any of DISH’s, CCTV’s or TVB’s rights or remedies at law or in equity, all of which are specifically reserved.

Sincerely,



Chris Kuelling
Senior Vice President, International Business & Legal Affairs
DISH Network L.L.C.



DISH Network L.L.C.
P.O. Box 6663, Englewood, CO 80155-6663
303.723-1000

November 20, 2014

Via Federal Express and Email

Club TVpad, Inc.
3240 Shawn Way
Hayward, California 94541

Email: clubtvpad.com@domainsbyproxy.com

Re: **Infringement of Programming**

To Whom It May Concern:

I am the Senior Vice President, International & Legal Affairs for DISH Network L.L.C. ("DISH"), which is the exclusive satellite provider in the United States of certain copyrighted television programming owned and distributed by China Central Television and its affiliated companies ("CCTV"), and the exclusive satellite and "over the top" provider in the United States of certain copyrighted television programming owned and distributed by Television Broadcasts Limited and its affiliated companies ("TVB"). On behalf of DISH, CCTV and TVB, I am writing to demand that you immediately cease and desist from infringing and/or contributing to the infringement of CCTV and TVB programs.

As you may know, DISH is a leading provider of satellite television programming in the United States, with over 14 million commercial and residential subscribers. In addition to providing programming that originates in the United States, DISH is also proud to provide its U.S. customers with programming that is produced in other countries. This includes television content from CCTV and TVB.

It has come to our attention that Asha Media is currently selling a set-top device known as the "TVpad" that enables customers to view pirated television broadcasts (played live, time-delayed, and on-demand) from overseas, including pirated television programming from Hong Kong and mainland China. We also understand that Asha Media promotes the availability of TVB and CCTV programming through the TVpad device. It is our further understanding that neither Asha Media nor any other party makes any payment to DISH, CCTV, TVB or other broadcasters for the use of this content, and neither DISH, CCTV nor TVB has authorized Asha Media or any other party to make content available through the TVpad. The unauthorized

reproduction, public performance, display, and distribution of CCTV and TVB content in the United States constitutes copyright infringement under U.S. law, as does the advertising and promotion of the availability of—and the encouragement of consumers to access—such infringing content.

It is our understanding that pirated CCTV and TVB content on the TVpad device is made available to your customers without authorization through an “app store,” by means of applications available through that store, some or all of which may operate on a peer-to-peer basis. In light of the foregoing, we have cause to believe that the parties responsible for acquiring, reproducing, and transmitting pirated CCTV and TVB content on the device, as well as customers who purchase and use the TVpad device, may directly infringe the copyrights in television programming for which DISH, CCTV and/or TVB owns exclusive rights. Asha Media is therefore liable for secondary copyright infringement because of its involvement in the sale and distribution of TVpad devices, its inducement of customers to infringe CCTV and TVB programming, and its material contribution to the infringing activities of others. Attached hereto as Exhibit A is a list of applications available on the TVpad app store that provide infringing content and a list of the CCTV and TVB channels transmitted through those applications. Attached hereto as Exhibit B is a representative list of some of the CCTV and TVB programs that are illegally provided through those applications. Please be aware, however, that all of the CCTV and TVB television programming accessible through the TVpad by whatever means—whether live, time-delayed, or on-demand—is infringing.

We demand that Asha Media immediately: (a) cease and desist selling TVpad devices that offer the applications listed in Exhibit A, or any similar infringing applications, through the TVpad app store; (b) cease and desist providing the applications listed in Exhibit A, and any similar applications; and (c) cease and desist marketing and promoting the availability of CCTV and TVB content on the TVpad, and encouraging consumers to access such content through the TVpad. Your continued infringing activity following receipt of this letter may constitute willful infringement.

This letter is without prejudice to any of DISH’s, CCTV’s or TVB’s rights or remedies at law or in equity, all of which are specifically reserved.

Sincerely,



Chris Kuelling
Senior Vice President, International Business & Legal Affairs
DISH Network L.L.C.

EXHIBIT 98

From: Kuelling, Chris <Chris.Kuelling@dish.com>
Sent: Monday, December 08, 2014 7:15 PM
To: 'sales@creatent.net'; 'help@itvpad.com'
Subject: TVpad
Attachments: Create New Technology (11-20-2014 letter).pdf

Dear Sir or Madame,

Please see attached letter.

Regards,
Chris

Chris Kuelling

SVP, International Business and Legal Affairs
DISH Network L.L.C.
9601 S. Meridian Boulevard
Englewood, Colorado 80112 U.S.A.
Direct: (303) 723-1444
Mobile: (720) 878-6951
Fax: (303) 723-2062
Email: chris.kuelling@dish.com



DISH Network L.L.C.
P.O. Box 6663, Englewood, CO 80155-6663
303.723-1000

November 20, 2014

Via Federal Express and Email

Create New Technology (HK) Limited
Room D, 10/F
Tower A, Billion Centre
1 Wang Kwong Road
Kowloon Bay, Kowloon
HONG KONG

Email: sales@creatent.net; help@itvpad.com

Re: Infringement of Programming

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I am the Senior Vice President, International & Legal Affairs for DISH Network L.L.C. ("DISH"), which is the exclusive satellite provider in the United States of certain copyrighted television programming owned and distributed by China Central Television and its affiliated companies ("CCTV"), and the exclusive satellite and "over the top" provider in the United States of certain copyrighted television programming owned and distributed by Television Broadcasts Limited and its affiliated companies ("TVB"). On behalf of DISH, CCTV and TVB, I am writing to demand that you immediately cease and desist from infringing and/or contributing to the infringement of CCTV and TVB programs.

As you may know, DISH is a leading provider of satellite television programming in the United States, with over 14 million commercial and residential subscribers. In addition to providing programming that originates in the United States, DISH is also proud to provide its U.S. customers with programming that is produced in other countries. This includes television content from CCTV and TVB.

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that CNT makes no payment to DISH, CCTV, TVB or other broadcasters for the use of this content, and neither DISH, CCTV nor TVB has authorized CNT or any other party to make CCTV or TVB content available through the TVpad. The unauthorized reproduction, public performance, display, and distribution of CCTV and TVB content in the United States constitutes copyright infringement under U.S. law.

It is our understanding that CNT is responsible not only for manufacture and sale of the TVpad device, but also for acquiring, reproducing and making available the unauthorized content on the device through an “app store,” by means of applications available through that store, some or all of which may operate on a peer-to-peer basis. In light of the foregoing, we have cause to believe that CNT and/or persons acting in concert with CNT are directly infringing the copyrights in television programming for which DISH, CCTV and/or TVB own exclusive rights, as well as inducing, materially contributing to, and failing to control the blatant infringing activities of others through the TVpad device.

Attached hereto as Exhibit A is a list of applications available on the TVpad app store that provide infringing content and a list of the CCTV and TVB channels transmitted through those applications. Attached hereto as Exhibit B is a representative list of some of the CCTV and TVB programs that are illegally provided by CNT and/or persons acting in concert with CNT. Please be aware, however, that all of the CCTV and TVB television programming accessible through the TVpad by whatever means—whether live, time-delayed, or on-demand—is infringing.

We demand that CNT and any parties acting in concert with CNT, or pursuant to CNT’s direction or control, immediately: **(a) cease and desist providing CCTV and TVB content through the TVpad and its affiliated network; and (b) cease and desist providing the applications listed in Exhibit A, and any similar infringing applications, through the TVpad app store or otherwise.** The continued reproduction, performance, display, and distribution of CCTV and TVB content following receipt of this letter may constitute willful infringement.

We note that CNT has not designated an agent under the Digital Millennium Copyright Act (“DMCA”) for notification of claims of infringement pursuant to Section 512(c) of the DMCA. However, for the avoidance of doubt, in the unlikely event that any of the infringing content delivered through the TVpad app store and the applications available therein is provided by third parties, this letter constitutes notice on behalf of DISH, CCTV and TVB, under 17 U.S.C. § 512(c)(3)(A), that DISH, CCTV and TVB have a good faith belief that the reproduction, performance, display, and distribution of these applications, and the content provided through these applications including the representative programming listed on Exhibit B, is not authorized and infringes the respective rights of DISH, CCTV and TVB in their copyrighted works. We accordingly demand that you remove or disable access to the infringing material. If you fail to do so, you may be liable for damages and injunctive relief. I certify that the information we have provided is accurate and that, under penalty of perjury, I am authorized to act on behalf of DISH, CCTV and TVB, owners of the rights infringed by the above-referenced content.

This letter is without prejudice to any of DISH's, CCTV's or TVB's rights or remedies at law or in equity, all of which are specifically reserved.

Sincerely,

A handwritten signature in black ink, appearing to read "CK", is written over the word "Sincerely,".

Chris Kuelling
Senior Vice President, International Business & Legal Affairs
DISH Network L.L.C.

From: Kuelling, Chris <Chris.Kuelling@dish.com>
Sent: Monday, December 08, 2014 6:59 PM
To: 'sales@tvpad.com'
Subject: TVpad
Attachments: Asha Media (11-20-2014 letter).pdf

Dear Sir or Madame,

Please see attached letter.

Regards,
Chris

Chris Kuelling

SVP, International Business and Legal Affairs

DISH Network L.L.C.

9601 S. Meridian Boulevard

Englewood, Colorado 80112 U.S.A.

Direct: (303) 723-1444

Mobile: (720) 878-6951

Fax: (303) 723-2062

Email: chris.kuelling@dish.com



DISH Network L.L.C.
P.O. Box 6663, Englewood, CO 80155-6663
303.723-1000

November 20, 2014

Via Federal Express and Email

Asha Media/TVpad.com
PO Box 6282
Brandon, Florida 33511

411 Walnut Street
Suite #5900
Green Cove Springs, FL, 32043

Email: sales@tvpad.com

Re: Infringement of Programming

To Whom It May Concern:

I am the Senior Vice President, International & Legal Affairs for DISH Network L.L.C. ("DISH"), which is the exclusive satellite provider in the United States of certain copyrighted television programming owned and distributed by China Central Television and its affiliated companies ("CCTV"), and the exclusive satellite and "over the top" provider in the United States of certain copyrighted television programming owned and distributed by Television Broadcasts Limited and its affiliated companies ("TVB"). On behalf of DISH, CCTV and TVB, I am writing to demand that you immediately cease and desist from infringing and/or contributing to the infringement of CCTV and TVB programs.

As you may know, DISH is a leading provider of satellite television programming in the United States, with over 14 million commercial and residential subscribers. In addition to providing programming that originates in the United States, DISH is also proud to provide its U.S. customers with programming that is produced in other countries. This includes television content from CCTV and TVB.

It has come to our attention that Asha Media is currently selling a set-top device known as the "TVpad" that enables customers to view pirated television broadcasts (played live, time-delayed, and on-demand) from overseas, including pirated television programming from Hong Kong and mainland China. We also understand that Asha Media promotes the availability of

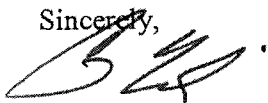
TVB and CCTV programming through the TVpad device. It is our further understanding that neither Asha Media nor any other party makes any payment to DISH, CCTV, TVB or other broadcasters for the use of this content, and neither DISH, CCTV nor TVB has authorized Asha Media or any other party to make content available through the TVpad. The unauthorized reproduction, public performance, display, and distribution of CCTV and TVB content in the United States constitutes copyright infringement under U.S. law, as does the advertising and promotion of the availability of—and the encouragement of consumers to access—such infringing content.

It is our understanding that pirated CCTV and TVB content on the TVpad device is made available to your customers without authorization through an “app store,” by means of applications available through that store, some or all of which may operate on a peer-to-peer basis. In light of the foregoing, we have cause to believe that the parties responsible for acquiring, reproducing, and transmitting pirated CCTV and TVB content on the device, as well as customers who purchase and use the TVpad device, may directly infringe the copyrights in television programming for which DISH, CCTV and/or TVB owns exclusive rights. Asha Media is therefore liable for secondary copyright infringement because of its involvement in the sale and distribution of TVpad devices, its inducement of customers to infringe CCTV and TVB programming, and its material contribution to the infringing activities of others. Attached hereto as Exhibit A is a list of applications available on the TVpad app store that provide infringing content and a list of the CCTV and TVB channels transmitted through those applications. Attached hereto as Exhibit B is a representative list of some of the CCTV and TVB programs that are illegally provided through those applications. Please be aware, however, that all of the CCTV and TVB television programming accessible through the TVpad by whatever means—whether live, time-delayed, or on-demand—is infringing.

We demand that Asha Media immediately: **(a) cease and desist selling TVpad devices that offer the applications listed in Exhibit A, or any similar infringing applications, through the TVpad app store; (b) cease and desist providing the applications listed in Exhibit A, and any similar applications; and (c) cease and desist marketing and promoting the availability of CCTV and TVB content on the TVpad, and encouraging consumers to access such content through the TVpad.** Your continued infringing activity following receipt of this letter may constitute willful infringement.

This letter is without prejudice to any of DISH’s, CCTV’s or TVB’s rights or remedies at law or in equity, all of which are specifically reserved.

Sincerely,



Chris Kuelling
Senior Vice President, International Business & Legal Affairs
DISH Network L.L.C.

From: Kuelling, Chris <Chris.Kuelling@dish.com>
Sent: Monday, December 08, 2014 7:12 PM
To: 'clubtvpad@domainsbyproxy.com'
Subject: TVpad
Attachments: Club TVpad (11-20-2014 letter).pdf

Dear Sir or Madame,

Please see attached letter.

Regards,
Chris

Chris Kuelling

SVP, International Business and Legal Affairs
DISH Network L.L.C.
9601 S. Meridian Boulevard
Englewood, Colorado 80112 U.S.A.
Direct: (303) 723-1444
Mobile: (720) 878-6951
Fax: (303) 723-2062
Email: chris.kuelling@dish.com



DISH Network L.L.C.
P.O. Box 6663, Englewood, CO 80155-6663
303.723-1000

November 20, 2014

Via Federal Express and Email

Club TVpad, Inc.
3240 Shawn Way
Hayward, California 94541

Email: clubtvpad.com@domainsbyproxy.com

Re: **Infringement of Programming**

To Whom It May Concern:

I am the Senior Vice President, International & Legal Affairs for DISH Network L.L.C. ("DISH"), which is the exclusive satellite provider in the United States of certain copyrighted television programming owned and distributed by China Central Television and its affiliated companies ("CCTV"), and the exclusive satellite and "over the top" provider in the United States of certain copyrighted television programming owned and distributed by Television Broadcasts Limited and its affiliated companies ("TVB"). On behalf of DISH, CCTV and TVB, I am writing to demand that you immediately cease and desist from infringing and/or contributing to the infringement of CCTV and TVB programs.

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It is our understanding that pirated CCTV and TVB content on the TVpad device is made available to your customers without authorization through an “app store,” by means of applications available through that store, some or all of which may operate on a peer-to-peer basis. In light of the foregoing, we have cause to believe that the parties responsible for acquiring, reproducing, and transmitting pirated CCTV and TVB content on the device, as well as customers who purchase and use the TVpad device, may directly infringe the copyrights in television programming for which DISH, CCTV and/or TVB owns exclusive rights. Asha Media is therefore liable for secondary copyright infringement because of its involvement in the sale and distribution of TVpad devices, its inducement of customers to infringe CCTV and TVB programming, and its material contribution to the infringing activities of others. Attached hereto as Exhibit A is a list of applications available on the TVpad app store that provide infringing content and a list of the CCTV and TVB channels transmitted through those applications. Attached hereto as Exhibit B is a representative list of some of the CCTV and TVB programs that are illegally provided through those applications. Please be aware, however, that all of the CCTV and TVB television programming accessible through the TVpad by whatever means—whether live, time-delayed, or on-demand—is infringing.

We demand that Asha Media immediately: **(a) cease and desist selling TVpad devices that offer the applications listed in Exhibit A, or any similar infringing applications, through the TVpad app store; (b) cease and desist providing the applications listed in Exhibit A, and any similar applications; and (c) cease and desist marketing and promoting the availability of CCTV and TVB content on the TVpad, and encouraging consumers to access such content through the TVpad.** Your continued infringing activity following receipt of this letter may constitute willful infringement.

This letter is without prejudice to any of DISH’s, CCTV’s or TVB’s rights or remedies at law or in equity, all of which are specifically reserved.

Sincerely,



Chris Kuelling
Senior Vice President, International Business & Legal Affairs
DISH Network L.L.C.

EXHIBIT 99

REDACTED

From: tvboxplayer@gmail.com [mailto:tvboxplayer@gmail.com] **On Behalf Of** TVPad Authorized Store
Sent: Monday, December 08, 2014 6:43 PM
To: Kuelling, Chris
Subject: Re: TVpad

Dear Chris,

I believe you are trying to contact the manufacturer which is www.itvpad.com

We are only a reseller.. just like amazon, rakutan and sears also selling the product.

All legal matters go to the manufacturer. Let me know if I can be of assistance.

Regards,
Amit
2017871546

On Dec 8, 2014 6:59 PM, "Kuelling, Chris" <Chris.Kuelling@dish.com> wrote:

Dear Sir or Madame,

Please see attached letter.

Regards,

Chris

Chris Kuelling

SVP, International Business and Legal Affairs

DISH Network L.L.C.

9601 S. Meridian Boulevard

Englewood, Colorado 80112 U.S.A.

Direct: (303) 723-1444

Mobile: (720) 878-6951

Fax: (303) 723-2062

Email: chris.kuelling@dish.com

EXHIBIT 102

From: Kuelling, Chris
Sent: Friday, December 19, 2014 4:16 PM
To: 'TVPad Authorized Store'
Subject: RE: TVpad
Attachments: Asha Media (12-19-2014).pdf

Dear Amit,

Please see the attached response to your December 8 email.

Regards,
Chris

Chris Kuelling

SVP, International Business and Legal Affairs
DISH Network L.L.C.
9601 S. Meridian Boulevard
Englewood, Colorado 80112 U.S.A.
Direct: (303) 723-1444
Mobile: (720) 878-6951
Fax: (303) 723-2062
Email: chris.kuelling@dish.com

From: tvboxplayer@gmail.com [<mailto:tvboxplayer@gmail.com>] **On Behalf Of** TVPad Authorized Store
Sent: Monday, December 08, 2014 6:43 PM
To: Kuelling, Chris
Subject: Re: TVpad

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All legal matters go to the manufacturer. Let me know if I can be of assistance.

Regards,
Amit
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On Dec 8, 2014 6:59 PM, "Kuelling, Chris" <Chris.Kuelling@dish.com> wrote:

Dear Sir or Madame,

Please see attached letter.

Regards,

Chris

Chris Kuelling

SVP, International Business and Legal Affairs

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Direct: (303) 723-1444

Mobile: (720) 878-6951

Fax: (303) 723-2062

Email: chris.kuelling@dish.com



DISH Network L.L.C.
P.O. Box 6663, Englewood, CO 80155-6663
303.723-1000

December 19, 2014

Asha Media/TVpad.com
ATTN: Amit Bhalla
PO Box 6282
Brandon, Florida 33511

411 Walnut Street
Suite #5900
Green Cove Springs, FL, 32043

Re: Infringement of Programming

Dear Mr. Bhalla:

I am writing in reply to your email of December 8, 2014, which responded to our cease and desist letter of November 20, 2014 concerning Asha Media's sale of the TVpad device and promotion of the TVpad's infringing capabilities.

We strongly disagree with your statement that Asha Media is "only a reseller" of the TVpad device. In addition to selling a device that delivers pirated content, Asha Media actively induces and encourages customers to purchase and use the TVpad device in order to access and infringe copyrighted Chinese-language television programs, including CCTV and TVB programs. In light of these activities, Asha Media is secondarily liable for the infringing conduct of its customers who use the TVpad device, as well as for the infringing conduct of other parties streaming pirated CCTV and TVB content to the TVpad device.

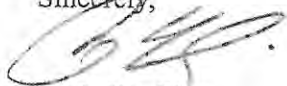
We understand that the exhibits to our prior letter may not have been attached. Therefore, attached hereto as Exhibit A is a list of applications available on the TVpad Store that provide infringing content, and a list of the CCTV and TVB channels transmitted through those applications. Attached hereto as Exhibit B is a representative list of CCTV and TVB programs illegally streamed through those applications. We reiterate that all of CCTV and TVB television programming streamed through the TVpad device by whatever means—whether live, time-delayed, or on-demand—is infringing.

We also reiterate our prior demands that Asha Media: immediately (a) cease and desist selling TVpad devices that offer the apps listed in Exhibit A through the TVpad Store; and (b)

cease and desist marketing and promoting the availability of CCTV and TVB content, and encouraging consumers to access such content through the TVpad. Your continued infringing activity following receipt of this letter may constitute willful infringement.

This letter is without prejudice to any of DISH's, TVB's or CCTV's rights or remedies at law or in equity, all of which are specifically reserved.







Sincerely,







A handwritten signature in black ink, appearing to read 'CK', is written over the word 'Sincerely,'.

Chris Kuelling
Senior Vice President
International Business & Legal Affairs
DISH Network L.L.C.

Exhibit A

TVpad "Live" Apps

TVpad App and icon	CCTV channels	TVB channels
BETV HD3 	CCTV 1 HD (live)	
BETV II 3 	CCTV 1 (live & replay live), CCTV 2 (live), CCTV 3 (live & replay live), CCTV 4 (live & replay live), CCTV 5 (live & replay live), CCTV 5+ (live), CCTV6 (live & replay live), CCTV 10 (live), CCTV 11 (live), CCTV12 (live), CCTV13 (live & replay live), CCTV14 (live & replay live), CCTV风云足球 (CCTV fengyun soccer) (live)	
BETV 3 	CCTV 1, CCTV 2, CCTV 3, CCTV 4, CCTV 5+, CCTV6, CCTV 10, CCTV 11, CCTV12, CCTV13, CCTV14, CCTV风云足球 (CCTV fengyun soccer) (all live)	
粵海時移3 (Yue Hai Shi Yi 3) 		JADE HD, JADE (both time- shifted by 12 hours)
粵海寬頻3 (Yue Hai Kuan Pin 3) 		JADE HD, JADE HD, J2, JADE, PEARL, interactive News (all live)
粵海寬頻23 (Yue Hai Kuan Pin 23) 		JADE HD, JADE, J2, PEARL, interactive News, JADE HD (live and replay live)

516TV 		TVBS (live)
516網路電視3 (516 Online TV 3) 	CCTV4 (live)	TVBS (live)
HITV 		JADE HD, J2, JADE, Pearl, interactive News (live)
港粵網絡電視 (Gang Yue Wang Luo Dian Shi) 		JADE HD, JADE, interactive News, J2, Pearl (live and replay live)
粵海直播 (Yue Hai Zhi Bo) 		Interactive News, J2, Pearl, JADE, JADE HD (live)
体育online3 (Sport online3) 	CCTV 1, CCTV 5, CCTV 5+, CCTV风云足球 (CCTV fengyun soccer) (all live)	

TVpad On Demand Apps

The following app plays CCTV programming:

华数TV (WASU TV)



The following apps play TVB programming:

港粤快看 (Gang Yue Kuai Kan)



港粤网络电视 (Gang Yue Wang Luo Dian Shi)



港台武侠 (Gang Tai Wu Xia)



EXHIBIT B

Representative Examples of Programs

CCTV Program Name	Original Broadcast Date	Channel	Application
Across the Straight 海峡两岸	9/22/14	CCTV-4	BETVII3
Across the Straight 海峡两岸	9/23/14	CCTV-4	BETVII3
Across the Straight 海峡两岸	9/24/14	CCTV-4	BETV
Across the Straight 海峡两岸	9/25/14	CCTV-4	BETVII3
Across the Straight 海峡两岸	9/27/14	CCTV-4	516
Across the Straight 海峡两岸	9/28/14	CCTV-4	516
Across the Straight 海峡两岸	10/4/14	CCTV-4	516
Across the Straight 海峡两岸	10/5/14	CCTV-4	516
Around China 走遍中国	9/22/14	CCTV-4	BETVII3
Around China 走遍中国	9/23/14	CCTV-4	BETVII3
Around China 走遍中国	9/24/14	CCTV-4	BETV
Around China 走遍中国	9/25/14	CCTV-4	BETVII3
Around China 走遍中国	9/27/14	CCTV-4	516
Around China 走遍中国	9/28/14	CCTV-4	516
Around China 走遍中国	10/4/14	CCTV-4	516
Around China 走遍中国	10/5/14	CCTV-4	516
Art Life 艺术人生	9/25/14	CCTV-3	BETVII3
Art Life 艺术人生	10/3/14	CCTV-3	BETVII3
Echo Clear 回声嘹亮	9/26/14	CCTV-3	BETVII3
Echo Clear 回声嘹亮	10/3/14	CCTV-3	BETVII3
Echo Clear 回声嘹亮	10/5/14	CCTV-3	BETVII3
Fashion Infinite 流行无限	9/28/14	CCTV-4	516
Fashion Infinite 流行无限	10/5/14	CCTV-4	BETVII3
I want to go to the Spring Festival gala 我要上春晚	9/28/14	CCTV-3	BETVII3
I want to go to the Spring Festival gala 我要上春晚	10/5/14	CCTV-3	BETVII3
Star Walk 星光大道	9/25/14	CCTV-3	BETVII3
Star Walk 星光大道	10/3/14	CCTV-3	BETVII3
Star Walk 星光大道	10/4/14	CCTV-3	BETVII3

To A Happy Departure 向幸福出发	9/22/14	CCTV-3	BETVII3
Variety Festival 综艺盛典	9/23/14	CCTV-3	BETVII3

TVB Program Name	Original Broadcast Date	Channel	Application
Pearl News 七點半新聞報導	9/29/14	Pearl	15
Come Home Love 愛回家	9/29/14	Jade	15
All That is Bitter is Sweet 大藥坊	9/29/14	Jade	15
Line Walker 使徒行者	9/29/14	JadeHD	14
Big Boy's Club 兄弟幫	9/29/14	J2	14
Pleasure & Leisure 都市閒情	9/30/14	Jade	15
Pearl News 七點半新聞報導	9/30/14	Pearl	15
Come Home Love 愛回家	9/30/14	Jade	14
All That is Bitter is Sweet 大藥坊	9/30/14	Jade	15
Line Walker 使徒行者	9/30/14	Jade	15
Big Boy's Club 兄弟幫	9/30/14	J2	15
Pleasure & Leisure 都市閒情	10/1/14	Jade	15
Pearl News 七點半新聞報導	10/1/14	Pearl	15
All That is Bitter is Sweet 大藥坊	10/1/14	Jade	HITV
Line Walker 使徒行者	10/1/14	Jade	HITV
Big Boy's Club 兄弟幫	10/1/14	J2	15
Pleasure & Leisure 都市閒情	10/2/14	Jade	15
Come Home Love 愛回家	10/2/14	Jade	15
All That is Bitter is Sweet 大藥坊	10/2/14	Jade	14
Big Boy's Club 兄弟幫	10/2/14	J2	15
Come Home Love 愛回家	10/3/14	Jade HD	15
Line Walker 使徒行者***	10/3/14	Jade	HITV
Line Walker 使徒行者***	10/3/14	Jade	
Big Boy's Club 兄弟幫	10/3/14	J2	15

A Closer Look 時事多面睇	10/6/14	inews	18
Big Boy's Club 兄弟幫	10/7/14	J2	HITV
Come Home Love 愛回家	10/8/14	Jade	15
Pleasure & Leisure 都市閒情	10/8/14	Jade	17
Big Boy's Club 兄弟幫	10/8/14	J2	15
Pleasure & Leisure 都市閒情	10/9/14	Jade	17
Pearl News 七點半新聞報導	10/9/14	Pearl	15

Additional TVB Programs available on-demand

TVB Program Chinese Name	TVB Program English name	VOD App.
寒山潛龍	Ghost Dragon of Cold Mountain	港粵快看 (gang yue kuai kan)
忠奸人	Black Heart White Soul	港粵快看 (gang yue kuai kan)
愛. 回家	Come Home Love	港粵快看 (gang yue kuai kan)
點金勝手	The Ultimate Addiction	港粵快看 (gang yue kuai kan)
我們的天空		港粵快看 (gang yue kuai kan)
食為奴	Gilded Chopsticks	港粵快看 (gang yue kuai kan)
守業者	Storm in a Cocoon	港粵快看 (gang yue kuai kan)
單戀雙城	Outbound Love	港粵快看 (gang yue kuai kan)
叛逃	Ruse of Engagement	港粵快看 (gang yue kuai kan)
女人俱樂部	Never Dance Alone	港粵快看 (gang yue kuai kan)
新抱喜相逢	Queen Divas	港粵快看 (gang yue kuai kan)
貓屎媽媽	Coffee Cat Mama	港粵快看 (gang yue kuai kan)
舌劍上的公堂	Return of the Silver Tongue	港粵快看 (gang yue kuai kan)
巨輪	Brother's Keeper	港粵快看 (gang yue kuai kan)
我們的天空	Shades of Life	港粵快看 (gang yue kuai kan)

		yue kuai kan)
My盛Lady	Bounty Lady	港粵快看 (gang yue kuai kan)
Call 36小時II	On The Hippocratic Crush II	港粵快看 (gang yue kuai kan)
法外風雲	Will Power	港粵快看 (gang yue kuai kan)
東張西望 20140804		港粵快看 (gang yue kuai kan)
東張西望 20140805		港粵快看 (gang yue kuai kan)
燭光晚餐		港粵快看 (gang yue kuai kan)
沒女大翻身		港粵快看 (gang yue kuai kan)
食平DD		港粵快看 (gang yue kuai kan)
SUNDAY扮嘢王		港粵快看 (gang yue kuai kan)
街頭魔法王2		港粵快看 (gang yue kuai kan)
瘋狂夏水禮		港粵快看 (gang yue kuai kan)
夏, 日, 悠遊		港粵快看 (gang yue kuai kan)
2014FIFA巴西世界杯-黃金戰報		港粵快看 (gang yue kuai kan)
2014FIFA巴西世界杯-熱爆巴西		港粵快看 (gang yue kuai kan)
走過足球聖地		港粵快看 (gang yue kuai kan)
快樂聯盟		港粵快看 (gang yue kuai kan)
寒山潛龍	Ghost Dragon of Cold Mountain	港粵網絡電視 (gang yue wang luo dian shi)
忠奸人	Black Heart White Soul	港粵網絡電視 (gang yue wang luo dian shi)
愛, 回家	Come Home Love	港粵網絡電視 (gang yue wang luo dian shi)
點金勝手	The Ultimate Addiction	港粵網絡電視 (gang yue wang luo dian shi)

搵個好男人		港粵網絡電視 (gang yue wang luo dian shi)
燭光晚餐		港粵網絡電視 (gang yue wang luo dian shi)
年代大激鬥		港粵網絡電視 (gang yue wang luo dian shi)
食平DD		港粵網絡電視 (gang yue wang luo dian shi)
食為奴	Gilded Chopsticks	港粵網絡電視 (gang yue wang luo dian shi)
守業者	Storm in a Cocoon	港粵網絡電視 (gang yue wang luo dian shi)
單戀雙城	Outbound Love	港粵網絡電視 (gang yue wang luo dian shi)
叛逆	Ruse of Engagement	港粵網絡電視 (gang yue wang luo dian shi)
女人俱樂部	Never Dance Alone	港粵網絡電視 (gang yue wang luo dian shi)
新抱喜相逢	Queen Divas	港粵網絡電視 (gang yue wang luo dian shi)
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巨輪	Brother's Keeper	港粵網絡電視 (gang yue wang luo dian shi)
我們的天空	Shades of Life	港粵網絡電視 (gang yue wang luo dian shi)
My盛Lady	Bounty Lady	港粵網絡電視 (gang yue wang luo dian shi)

Call 36小時II	On The Hippocratic Crush II	港粵網絡電視 (gang yue wang luo dian shi)
法外風雲	Will Power	港粵網絡電視 (gang yue wang luo dian shi)
幸福摩天輪		港粵網絡電視 (gang yue wang luo dian shi)
耀舞長安		港粵網絡電視 (gang yue wang luo dian shi)
天梯		港粵網絡電視 (gang yue wang luo dian shi)
廉政行動		港粵網絡電視 (gang yue wang luo dian shi)
心路GPS		港粵網絡電視 (gang yue wang luo dian shi)
熟男有惑		港粵網絡電視 (gang yue wang luo dian shi)
師父明白了		港粵網絡電視 (gang yue wang luo dian shi)
造王者		港粵網絡電視 (gang yue wang luo dian shi)
巴不得媽媽		港粵網絡電視 (gang yue wang luo dian shi)
衝上雲霄2		港粵網絡電視 (gang yue wang luo dian shi)
神探哥倫布		港粵網絡電視 (gang yue wang luo dian shi)
神鎗追擊		港粵網絡電視 (gang yue wang luo dian shi)
金枝慾孽II		港粵網絡電視 (gang yue wang luo dian shi)

圓月彎刀	Against the Blade of Honour	港台武俠 (gang tai wu xia)
天子尋龍	Whatever It Takes	港台武俠 (gang tai wu xia)
天機算	A Change of Destiny	港台武俠 (gang tai wu xia)
太極	The Master of Tai Chi	港台武俠 (gang tai wu xia)
精武門	Fist of Fury	港台武俠 (gang tai wu xia)
洗冤錄	Witness to a Prosecution	港台武俠 (gang tai wu xia)
碧血鹽梟	Sweetness in the Salt	港台武俠 (gang tai wu xia)
封神榜	Gods of Honour	港台武俠 (gang tai wu xia)
幕后大老爺	Man In Charge	港台武俠 (gang tai wu xia)
倚天屠龍記	Heaven Sword and Dragon Sabre	港台武俠 (gang tai wu xia)
尋秦記	A Step into the Past	港台武俠 (gang tai wu xia)
新方世玉	Heroes Of The Times	港台武俠 (gang tai wu xia)
天龍八部	The Demi-Gods and Semi-Devils	港台武俠 (gang tai wu xia)
神雕俠侶	The Condor Heroes	港台武俠 (gang tai wu xia)
射雕英雄傳	The Legend of the Condor Heroes	港台武俠 (gang tai wu xia)
少年四大名捕	The Four	港台武俠 (gang tai wu xia)
女拳	Grace Under Fire	港台武俠 (gang tai wu xia)
鹿鼎記	The Deer and the Cauldron	港台武俠 (gang tai wu xia)
霍元甲	Fearless	港台武俠 (gang tai wu xia)
大唐雙龍傳	Twin of Brothers	港台武俠 (gang tai wu xia)